

1 Michael L. Mallow (SBN 188745)
mmallow@shb.com
2 Rachel A. Straus (SBN 268836)
rstraus@shb.com
3 SHOOK, HARDY & BACON L.L.P.
2049 Century Park East, Suite 3000
4 Los Angeles, CA 90067-3204
Phone: (424) 285-8330
5 Fax: (424) 204-9093

6 BOWMAN AND BROOKE LLP
Cary A. Slobin (*pro hac vice* forthcoming)
7 cary.slobin@bowmanandbrooke.com
5830 Granite Parkway Suite 1000
8 Plano, TX 75024
Telephone: 972.616.1766
9 Facsimile: 972.616.1701

10 *Attorneys for Defendant*
11 *TOYOTA MOTOR SALES, U.S.A., INC.*
12 *and TOYOTA MOTOR CORPORATION*

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 MARIANO ALANIZ, individually and
16 on behalf of all others similarly situated,
17 Plaintiff,
18 v.
19 TOYOTA MOTOR CORPORATION, et
al.,
20 Defendant.
21
22
23
24
25
26
27
28

Case No. 4:20-cv-01351-JST

Assigned to: Hon. Jon S. Tigar

**STIPULATION TO EXTEND TIME
FOR THE TOYOTA DEFENDANTS
TO RESPOND TO THE
COMPLAINT**

Complaint Served: February 21, 2020

1 In light of the current public health crisis relating to the coronavirus pandemic¹,
 2 Plaintiff Mariano Alaniz (“Plaintiff”) and Defendants Toyota Motor Corp. (“TMC”)
 3 and Toyota Motor Sales, U.S.A., Inc. (“TMS”) in the above-captioned matters
 4 stipulate and agree as follows:

5 WHEREAS on February 21, 2020, Plaintiff filed his Complaint in this Court;

6 WHEREAS on February 27, 2020, Plaintiff served TMS with the Complaint
 7 through TMS’ registered agent;

8 WHEREAS, TMS’ deadline to respond to Plaintiff’s Complaint was March 19,
 9 2020;

10 WHEREAS on March 31, 2020, counsel for TMC agreed to accept service
 11 pursuant to the terms set forth in the parties’ Stipulation Regarding Service of Process
 12 on TMC;

13 WHEREAS on March 31, 2020, Plaintiff agreed to extend the deadline for
 14 TMC and TMS to respond to the Complaint until May 1, 2020;

15 THEREFORE, the Parties, by and through their respective counsel, subject to
 16 Court approval, hereby stipulate to extend the time for TMC and TMS to answer,
 17 object, or otherwise respond to Plaintiff’s Complaint as follows:

- 18 1. The deadline for TMC and TMS to answer, object, or otherwise respond to
 19 Plaintiff’s Complaint shall be May 1, 2020.

20 **IT IS SO STIPULATED.**

21
 22 Dated: April 1, 2020

Respectfully submitted,

23 SHOOK, HARDY & BACON L.L.P.

24
 25 By: /s/ Rachel A. Straus

26 Rachel A. Straus

27 Michael L. Mallow

28 ¹ On March 11, 2020 the World Health Organization declared the coronavirus (COVID-19) a global pandemic. (<https://www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19---11-march-2020>)

Attorneys for TMS

Dated: April 1, 2020

Respectfully submitted,
BURSOR & FISHER, P.A.

By: /s/ L. Timothy Fisher
L. Timothy Fisher
Scott A. Bursor

Attorneys for Plaintiff

SO ORDERED:

DATED: _____

Honorable Jon S. Tigar
United States District Court Judge